

BILL EMLEN
Director
(707) 784-6765

TERRY SCHMIDTBAUER
Assistant Director
(707) 784-6765

JAGJINDER SAHOTA
Environmental Health Manager
(707) 784-6765

DEPARTMENT OF RESOURCE MANAGEMENT



SOLANO
COUNTY

675 Texas Street, Suite 5500
Fairfield, CA 94533-6342
(707) 784-6765
Fax (707) 784-4805

www.solanocounty.com

Environmental Health Division

April 10, 2020

Synagro West LLC
Care of: Simranpreet Kaur
Technical Services Manager
3110 Gold Canal Drive, Ste E
Rancho Cordova, CA 95670

**RE: Biosolids Land Application – Land Spreading Site # 801750
McCormack Farms, SO-21 Fields: 2, 3, 4, 5, 6, 9, and 12
Conditional Approval to begin Biosolids Land Application operations on SO-21 fields**

Dear Ms. Kaur:

This letter will confirm receipt of information submitted to this office as required in Solano County Code, Chapter 25, and serve as Notification of Conditional Approval for 2020 land application season.

The following documents are received pertaining to the Biosolids Land Spreading Application for McCormack Ranch (SO-21):

I. Biosolids Land Pre-Application report information received:

The following items were received and reviewed:

1. Land Spreading Notification Report, 2020
2. 2020 Land Spreading Analytical Package for Solano County, including Notice and Necessary Information (NANI) for biosolids generators.
Note: NANI not received for the following generators:
 - Calistoga Wastewater Treatment Plant
 - City of Eureka
 - City of Fort Bragg
 - Sunnyvale Water Pollution Control Plant
3. Proposed Biosolids / Plant Available Nitrogen (PAN) land application rate
4. Projected pollutant loading rate
5. Quarterly groundwater sampling data for the past 12 months for pollutants, nitrates, E. coli, and fecal coliform bacteria
6. Sources and Transportation of Biosolids Materials including Haulers and the Proposed Transportation Plan for Biosolids Land Spreading – McCormack Ranch
7. Storage, Staging, Site Controls, Odor Control Contingency Plan – Adverse Weather Plan McCormack Ranch

SAEED IRAVANI
Building Official
Building & Safety

MIKE YANKOVICH
Program Manager
Planning Services

JAG SAHOTA
Manager
Environmental
Health

SARAH PAPPAKOSTAS
Senior Staff Analyst
Administrative
Services

MATT TUGGLE
Engineering Manager
Public Works
Engineering

CHARLES BOWERS
Operations
Manager
Public Works
Operations

CHRIS DRAKE
Parks Services
Manager
Parks

ROBERTA GOULART
Water & Natural
Resources Program
Manager

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8. Indemnification Agreement between the operator and the property owner
9. Copy of Synagro's Certificate of Liability Insurance for Pollution and Remediation. The policy term is valid through **August 1, 2020**. Corporate surety bond, with wet signature, is submitted by Synagro as required for operations conducted in Solano County. The filed Surety Bond is valid through **May 31, 2020**.
10. Copies of the written public notice stating the land application of biosolids is to occur between April 15, 2020 and October 15, 2020, as published in the Fairfield Daily Republic, March 4, 2020, and in the Vacaville Reporter, on March 3, 2020.
11. Copies of Priority Mail with USPS Tracking numbers for notifications of adjacent residents regarding the planned land spreading activity.
12. Land Spreading Notification Fee in the amount of \$14,157

Within 30 days after each land application of biosolids, a Post-application report shall be provided to Solano County Department of Resource Management, Environmental Health Division.

II. Central Valley, Regional Water Quality Control Board (CV-RWQCB) approval for Biosolids Land Application

McCormack Ranch fields SO-21-2, -3, -4, -5, -6, -9, and -12 are under the jurisdiction of the Central Valley Region, California Regional Water Quality Control Board (CV-RWQCB).

Fields SO-21-2, -3, -4, -5, -6, -9, and -12 are governed by the CV-RWQCB under the following:

1. Water Quality Order NO. 2004-0012-DWQ:
General Waste Discharge Requirements for the Discharge Of Biosolids To Land For Use As A Soil Amendment In Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities
2. CV-RWQCB Monitoring and Reporting Program No. R5-2009-0846:
SYNAGRO WEST, INC. AND DUNCAN McCORMACK, McCORMACK FARMS (SO-21), Solano County

Please note that Solano County approval for land spreading of all fields is valid only with the continued concurrence of the CV-RWQCB. Copies of any other report required by the CV-RWQCB, as part of the Waste Discharge Report or otherwise, the USEPA, or any other regulatory agency, shall be sent to Solano County Environmental Health.

Since at least 2014, the CV-RWQCB has approved an agronomic rate of 200 lbs. PAN/acre for the fields proposed for biosolids land application. The agronomic rate for PAN application has similarly been approved for the 2020 season as 200 lbs. PAN/acre.

III. The land application of biosolids shall meet all applicable rules and regulations, including, but not limited to:

1. US EPA 40CFR 503 regulations
2. State of California Water Quality Control Board, Water Quality Order 2004-0012-DWQ-0004 and Monitoring and Reporting Program No R5-2009-0846
3. Solano County Code Chapter 25

IV. Additional conditions for the application of biosolids onto this field are:

1. The site conditions shall be verified as suitable to prevent the tracking of mud and/or biosolids onto the County roads, and soil conditions shall allow for the operation of the tractor and disk to incorporate biosolids properly into the soil as required by Solano County Code, Chapter 25, regulating Biosolids Land Application.
2. Water samples shall be collected from all irrigation wells located on registered fields during the 2020 season. At least one sample from each well shall be collected. Testing shall include: soluble metals: arsenic, cadmium, copper, lead, mercury and nickel in mg/L. Testing of the water well sample shall also include total dissolved solids, chloride, sodium, nitrate/nitrogen in mg/L.
3. Samples of biosolids material may be collected at the site and tested at the applicators expense. Testing may include pollutants, pathogen indicators, Salmonella species, enteric virus, and/or helminth ova.
4. The Department may require additional sampling and analysis as indicated in Solano County Code, Chapter 25, section 25-402(c) **Requirements for Landspreading Notification** if conditions exist during the applications which may promulgate public concern or where there is potential for a public health hazard. The number and location of samples may not be limited to biosolids, but can include soil and/or water on proposed, presently active or past biosolids application sites. Additional sample analyses shall not be limited as to the constituents analyzed for and may include heavy metals concentrations (consistent with the limits set forth in 40 CFR 503), pathogens (consistent with 40 CFR 503), and other constituents which may be of concern in protection of the public health and/or the environment.
5. Synagro, LLC. shall provide a determination by Resource Management, Public Works, Road Division regarding impact on maintenance to roads, and as directed by Public Works and shall maintain a current surety bond with this office.
6. As a reminder, Section 25-402(a)(4): **General Requirements** of the Solano County Code, Chapter 25 identifies setback distances for biosolids staging areas and land application. As stated, adequate setbacks shall be provided at a minimum as follows:
 - (A) 100 feet from property lines.
 - (B) 500 feet from any type of water supply wells;
 - (C) One-quarter mile (1,320 feet) from any residence located off sites registered for biosolids application. This distance shall be increased to two miles from city limits or employment centers on Travis Air Force Base;
 - (D) One-quarter mile (1,320 feet) from residence located on sites registered for biosolids application unless waived by owner occupied residence;
 - (E) 100 feet from public roads, and
 - (F) 200 feet from surface waters, including intermittent and perennial streams, surface waterways, primary drainages, ponds, lakes and marshes;
 - (G) 2,500 feet from any domestic surface water supply intake.
7. The applicator shall provide the record on wind speed by the next business day to the Department's office by fax (707-784-4805) or email (EHTechnical@SolanoCounty.com), for days in which land spreading occurs.
8. Specific deliveries of biosolids at the land spreading site may be rejected for nuisance issues or environmental condition.

9. Additional water and soil samples may be required after completion of land spreading, and may include sampling of soil and water to coincide with wet weather conditions and/or storm events.

The operation will be inspected pursuant to Solano County Code, Chapter 25. The land application of biosolids may commence upon compliance with the above listed conditions, and continued concurrence with the Central Valley and San Francisco Bay Region, California Regional Water Quality Control Boards.

V. Approval to begin the Land Application of Biosolids on April 15, 2020 is hereby granted with the following conditions:

1. Approval is specific to the following registered fields: SO-21-2, -3, -4, -5, -6, -9, and -12.
2. Approval does not include land application of loads from the following generators:

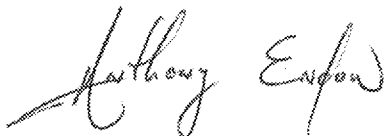
- Calistoga Wastewater Treatment Plant
- City of Eureka
- City of Fort Bragg
- Sunnyvale Water Pollution Control Plant

These generators can be approved once a Notice And Necessary Information (NANI) from the generator has been submitted and verified

3. Approval is limited to a maximum application rate of 200 calculated lbs. Plant Available Nitrogen (PAN)/acre for all fields, which shall include the residual PAN carryover as calculated in EPA guidance.

If you have any questions or concerns about these requirements, feel free to contact me (707) 784-6765 or ayendow@solanocounty.com.

Sincerely,



Anthony Endow, REHS
Senior Environmental Health Specialist
Solano County Environmental Health

cc: Scott Armstrong, Central Valley Regional Water Quality Control Board
Scott.Armstrong@waterboards.ca.gov (via email)
11020 Sun Center Dr, #200, Rancho Cordova, CA 95670-6114

Lauren Fondahl, USEPA Region IX
Fondahl.Lauren@epa.gov (via email)
75 Hawthorne Street, San Francisco, CA 94105